

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ROBERTA FOSBINDER-BITTORF

individually and on behalf
of all others similarly situated,

Plaintiff,

Case No: 11-cv-592

vs.

SSM HEALTH CARE OF WISCONSIN, INC.

Defendant.

**JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY PRE-TRIAL AND
TRIAL DEADLINES PENDING SETTLEMENT APPROVAL**

WHEREAS the Plaintiff, individually and on behalf of the members of the putative classes, and Defendant, by and through their undersigned counsel, reached a settlement of the Plaintiff and putative class members' claims through mediation completed on June 6, 2013;

WHEREAS the parties are working jointly to finalize the settlement agreement, and to draft the parties' Joint Motion for Preliminary Approval of Settlement and documents in support thereof;

WHEREAS the parties anticipate filing their Joint Motion for Preliminary Approval of Settlement no later than July 19, 2013; and

WHEREAS pending filing deadlines in this matter will impede the parties' ability to work jointly to prepare and file the documents necessary to effectuate this class action settlement.

WHEREFORE, the parties respectfully request that the Court Stay all pre-trial and trial deadlines in this action pending any decision the Court renders regarding the parties' Joint Motion for Preliminary Approval of Settlement, to be filed no later than July 19, 2013.

Respectfully submitted this 11th day of June, 2013.

Attorneys for Plaintiff

By: /s/ William E. Parsons

HAWKS QUINDEL, S.C.

William E. Parsons, State Bar No. 1048594

Email: wparsons@hq-law.com

David C. Zoeller, State Bar No. 1052017

Email: dzoeller@hq-law.com

Danielle M. Schroder, State Bar No. 1079870

Email: dschroder@hq-law.com

Summer Murshid, State Bar No. 1075404

Email: smurshid@hq-law.com

Larry A. Johnson, State Bar No. 1056619

Email: ljohnson@hq-law.com

Post Office Box 2155

Madison, Wisconsin 53701-2155

Telephone: 608/257-0040

Facsimile: 608/256-0236

HABUSH HABUSH & ROTTIER, S.C.

Daniel A. Rottier, State Bar No. 1016998

Email: rottier@habush.com

Robert L. Habush, State Bar No. 1008419

Email: rhabush@habush.com

Jason Knutson, State Bar No. 1035801

Email: jknutson@habush.com

150 East Gilman St., Suite 2000

Madison, WI 53703

Telephone: 608-255-6663

Facsimile: 608-255-0745

Attorneys for Defendant

By: s/ Noah A. Finkel
SEYFARTH SHAW LLP

Edward W. Bergmann
Noah A. Finkel
Kyle A. Petersen
Jay C. Carle
James C. Goodfellow, Jr.
131 South Dearborn Street, Suite 2400
Chicago, Illinois 60603
(312) 460-5000

BECK, CHAET, BAMBERGER & POLSKY, S.C.

Christopher J. Johnson
Kate L. Williams
Two Plaza East, Suite 1085
330 E. Kilbourn Avenue
Milwaukee, WI 53202
Phone: (414) 273-4200